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September 4, 2025

BY HAND DELIVERY & CM/ECF

The Honorable Leonard P. Stark
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 North King Street
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

The Special Master respectfully submits this letter regarding the Venezuela Parties' (D.I. 2122) and Gold Reserve Ltd.'s (D.I. 2134) request to serve unredacted versions of the August 11 and August 13 *ex parte* transcripts (the "**Ex Parte Transcripts**") on the parties participating in discovery (the "**Discovery Parties**") and the Court's related September 3 *Oral Order* (D.I. 2136).

As set forth in the *Special Master's Response to Gold Reserve's Motion to Unseal Ex Parte Transcripts* (D.I. 2115), the Special Master considered it was appropriate to redact limited portions of the Ex Parte Transcripts as they contained confidential information about active bids that he was assessing for the purposes of his updated recommendation that had yet to be made. *See id* at 2.

Now that the *Special Master's Updated Final Recommendation* (D.I. 2123) has been filed, the Special Master consents to the request of the Venezuela Parties and Gold Reserve to serve the unredacted versions of the Ex Parte Transcripts on the Discovery Parties. The Special Master also has no objection to filing unredacted versions of the Ex Parte Transcripts on the public docket. The Special Master will promptly provide unredacted copies of the Ex Parte Transcripts to the Discovery Parties and/or make them available on public docket as directed by the Court.

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Respectfully submitted,

/s/ Myron T. Steele

Myron T. Steele

On Behalf of Robert B. Pincus, Special Master for
the United States District Court for the District of
Delaware

MTS:rms/12449126/21202.00001

cc: Clerk of Court (via hand delivery)
Counsel of Record (via CM/ECF)